

## HUXLEY POLICE DEPARTMENT

## IN THE IOWA DISTRICT COURT IN AND FOR STORY COUNTY

## THE STATE OF IOWA

COUNTY OF STORY

VS.

Before Magistrate \_\_\_\_\_

Criminal Number \_\_\_\_\_

*Burkle, Jackie Nichole*  
*514 N Main Ave Apt B*  
*Huxley, Iowa 50124*

WFA  
 DOB: 09-09-1989

HPD Case # H12-0002

## COMPLAINT AND AFFIDAVIT

The defendant is accused of the crime of *Murder in the 1<sup>st</sup> degree - 2 counts* in violation of Section 707.1 & 707.2 (1) of the *Iowa Criminal Code* in which said crime is a *Class "A" Felony* and that the defendant on or about the 6th day of *January, 2012*, at approximately *7:30 am* hours at, *514 N Main Ave Apt B* in *Story County*, did unlawfully wilfully, deliberately and with premeditation, kills another human being.

THEREFORE, Complainant requests that said Defendant, subject to bail or conditions of release where applicable

- (1) be arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
- (2) be detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant *M. P. Pote* - 85-640  
 Police Chief Mark Pote (85-640)

STATE OF IOWA,  
 AFFIDAVIT

I, the undersigned, being duly sworn, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed this crime.

*On January 7<sup>th</sup> at 6:05 am, I was given information that the defendant had possibly given birth. The defendant was seen at work on January 5<sup>th</sup> and appeared to be pregnant and then was seen at work on January 7<sup>th</sup> and appeared not to be pregnant with a completely different physical appearance. This information lead officers to interview the defendant. The defendant agree to go to the hospital and agree to a blood test which she took and indicated she was or had been pregnant recently. The defendant consented to a further interview in which she admitted to this officer that she had given birth to twins and told the location of the bodies. 1<sup>st</sup> Responders determined both new borns were deceased on 01-07-12. The defendant agreed to yet a further interview during which she admitted she had acted or committed certain acts to terminate the lives of both new born infants. The defendant further admitted that she intended to end their lives and was not at any time intending that they would live.*

Signature of Affiant

*M. P. Pote* - 85-640  
 Police Chief Mark Pote (85-640)

Subscribed and sworn to me before me by the person(n) signing this Complaint (and affidavit(s)) on this the 10<sup>th</sup> day of January 20 12.

Signature of Notary

Complaint and affidavit(s) filed and probable cause found that the defendant committed the offense charged.

Magistrate \_\_\_\_\_

